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HONORABLE TIMOTHY W. DORE  
HEARING DATE: September 19, 2018  
TIME: 9:30 am

Chapter 13

4 **IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
5 WESTERN DISTRICT COURT OF WASHINGTON**

6 **Re** )  
7 **SINPRASEUT PHOMMA** )  
8 )  
9 **Debtor(s)** )  
----- )  
In Chapter 13 Proceeding  
No. 18-12071-TWD  
**RESPONSE TO OBJECTION TO  
CONFIRMATION**

10 COMES NOW the above-referenced debtor(s) through their attorneys of record and  
11 states:

12 The Debtor has requested but not yet received a copy of the second mortgage which  
13 is not due until sale of the property. The documents are expected to be received within  
14 the next few days and, if necessary, an amended Plan will be filed if necessary.

15 Debtor's counsel requested several weeks ago any other changes requested to this  
16 case from the Trustee and stated that the amended Plan would be set for hearing as  
17 soon as the documents were received so that a correct plan could be confirmed.  
18 Debtor's counsel also called to inform the Trustee's office that she would be going to the  
19 hospital this week and requested to know if there were any other issues and did not  
20 hear back from them.

21 On Monday the Chapter 13 office filed a new Objection to Confirmation and today  
22 entered a Declaration of no Objection and Received Unsigned Order even though they  
23 are aware that Debtor's counsel is extremely ill and not at the office.

24 The Debtor requests that the Order not be entered and to allow her to file the notice  
25 to confirm Amended Plan and a proof of service tomorrow. It was previously indicated  
that it would be more beneficial to wait until the second mortgage information had been  
received but since it is imperative that this matter not be dismissed the Notice and  
Motion and Proof of Service on the current Plan will be filed tomorrow and the  
requested Trustee documents of the second mortgage will be forwarded immediately  
upon receipt as they have been requested and the request has been verified by phone  
but the documents have not yet arrived.

1  
2 Therefore it is requested that this matter not be dismissed, that the Notice to Confirm  
3 and Proof of Service be allowed to be filed tomorrow in this matter and that the Trustee  
4 be allowed to receive the requested second mortgage document as soon as available  
and that the case not be dismissed due to the document's delay as the Debtor and her  
attorney have requested the documentation after the meeting of creditors but it has not  
yet been received.

5 Dated September 13, 2018  
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7 /s/ Ellen Ann Brown  
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9 ELLEN ANN BROWN WSB#27992  
10 Attorneys for Debtor(s)